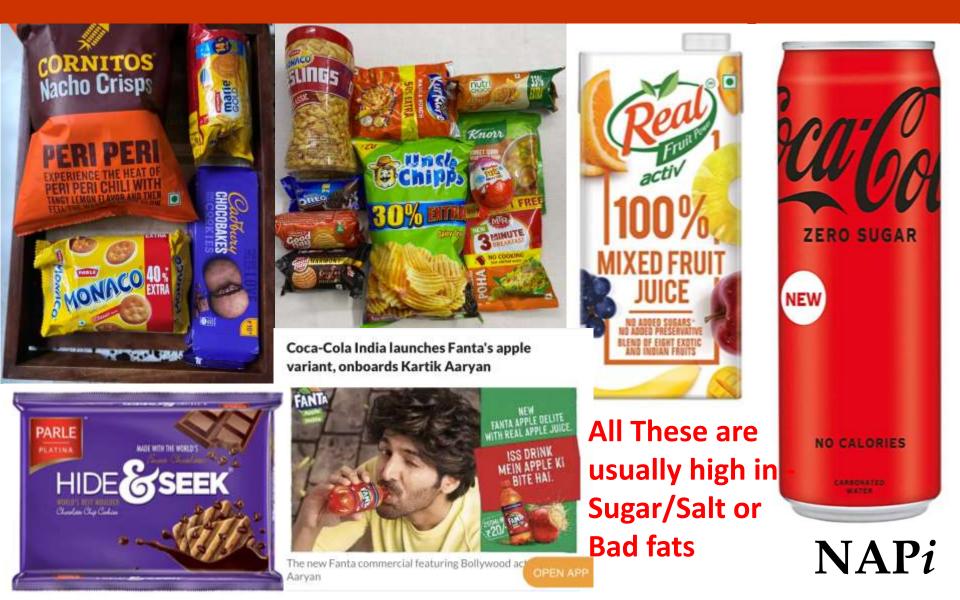
### Should there be "Stars" or "Alerts" on Front of the Pack of the Unhealthy Pre-Packaged Food Products?

(Add your name, Designation and mail address)



# Talking about such Pre-Packaged foods products/drinks



### Why are these Unhealthy?

- Typically high in sugar, salt, or fat.
- Scientific evidence shows these are associated with poor health outcomes like obesity, diabetes, cancers.
- These are Industrially formulated
- Added stabilizers, emulsifiers, other additives, flavors, and colors.
- Contain more than 5 ingredients
- Misleadingly advertised claiming to be healthy, happy, loving etc.

## FSSAI come up with a plan to label these products as "healthy" and give "Stars"



## HIGH IN SUGAR

#### To label these food products on the Front of Pack – boldly the FSSAI has come up with a draft policy seeking public comments

#### FOOD SAFETY AND STANDARDS AUTHORITY OF INDIA

#### NOTIFICATION

New Delhi, the 13th September, 2022

**F. No. Std./SP-08/T(FoPNL-N-01).**—The following draft of certain regulations to further amend the Food Safety and Standards (Labelling & Display) Regulations, 2020, which the Food Safety and Standards Authority of India proposes to make with previous approval of the Central Government, in exercise of the powers conferred by clause (k) of sub-section (2) of section 92 read with clause (h) of sub-section (2) of section 16 and section 23 of the Food Safety and Standards Act, 2006 (34 of 2006) is hereby published as required by sub-section (1) of section 92 of the said Act, for the information of all persons likely to be affected thereby, and notice is hereby given that the said draft regulations shall be taken into consideration after the expiry of the period of sixty days from the date on which copies of the Official Gazette in which this notification is published are made available to the public;

Objections or suggestions, if any, may be addressed to the Chief Executive Officer, Food Safety and Standards Authority of India, FDA Bhawan, Kotla Road, New Delhi- 110002 or may be sent by e-mail at regulation@fssai.gov.in;

Objections or suggestions which may be received with respect to the said draft regulations within the period specified above shall be considered by the Food Safety and Standards Authority of India.

#### **Draft Regulations**

Short title and commencement-(1) These regulations may be called the Food Safety and Standards (Labelling & Display) Amendment Regulations, 2022.

#### **Definitions Used in – Draft Notification**

 High fat, sugar, salt (HFSS) food means a processed food product which has high levels of saturated fat or total sugar or sodium. The declared values of these ingredients are such that the product; does not satisfy the value of energy (kcal) from total sugar less than 10 percent of total energy, or from saturated fat 10 percent of total energy, and sodium less than 1 mg/1 kcal."

# Definition is in contradiction with the proposal

- Food risk factors in the Table 1 of the Proposal are very high.
- For example Total Sugar is proposed at 21gm/100 which is double.



#### Comparison of FSSAI and WHO -PAHO Food Risk factors

FSSAI Baseline Reference Value for Food Risk Factors (per 100 gm/100ml)			WHO-PAHO Nutrient Profile Criteria of Excessive Food Risk Factors	
Food Risk Factors	Solid Foods	Liquid Foods (Non-Dairy)	Food Risk Factors	Reference Value
Energy (Kcal)	400	30	Sodium (mg)	≥ 1 mg per 1 kcal
Total Sugars (g)	21	6	Free Sugars (g)	≥ 10% of total energy
Saturated Fat (g)	5	3	Other Sweeteners	Any amount of other Sweeteners
Sodium (mg)	450	100	Total Fat	≥ 30% of total energy
			Saturated Fat	≥ 10% of total energy
			Trans Fat	$\geq$ 1% of total energy

### **Regulation Key points**

- Food risk factors are identified as sugar , salt/sodium and saturated fats as
- Definition of High Fat, Sugar, salt (HFSS) Food available
- Plan to provide "Stars", and belief that more stars make a good diet.
- ½ to 5 Stars indicating "least healthy" to "Healthiest" foods
- Addition of Fruits & Vegetables/ Nuts/Legumes/Fibre/Protein makes food products healthy.
- 4 years to implement to food industry

N A Pi

# Look at few products...all have risk factors and are Star valued.







As per WHO SEARO Cut Off limits for negative nutrients







As per WHO SEARO Cut Off limits for negative nutrients





HIGH IN TOTAL SUGAR

As per WHO SEARO Cut Off limits for megative nutrients

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. . .

Indian Nutrition Rating



As per WHO SEARO Cut Off limits for negative nutrients

#### **FSSAI seeks public comments**



## You can make a difference ! Send your Comments to FSSAI

#### **OBJECTIONS**

- 1. Why Stars ?
- 2. Why call junk food/unhealthy to be healthy?
- 3. Why give 4 years?

#### **SUGGESIONS**

- Alert citizens about food products which are high in Sugar, Sodium or saturated fats.
- Reduce the compliance period to 6 months.

#### Where and how to send?

• Address: The Chief Executive Officer (CEO), Food Safety and Standards Authority of India, FDA Bhawan, Kotla Road, New Delhi: 110 002.

- Email: regulation@fssai.gov.in
- YOU MAY SEND A SPEED POST OR EMAIL

## **THANK YOU**

